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November 30, 2016

**VIA ECF**

Hon. George B. Daniels  
 United States District Judge  
 United States District Court  
 for the Southern District of New York  
 500 Pearl Street  
 New York, NY 10007-1312

RE: *Sokolow, et al. v. Palestinian Liberation Organization, et al.*, Docket No. 04-CV-397 (GBD)(RLE); Proposed Order on Defendants' Request to Vacate Bond Order and for Immediate Return of Bond Funds.

Dear Judge Daniels:

On behalf of Defendants Palestinian Authority and Palestine Liberation Organization, and at the Court's direction, we respectfully submit (at Tab A) Defendants' proposed order granting their application (ECF No. 997) to vacate all remaining provisions of this Court's August 24, 2015 Order (ECF No. 957) ("Bond Order") and to return to Defendants forthwith all funds deposited by Defendants into the Court's Registry pursuant to the Bond Order together with all interest accrued thereon. The proposed order also reflects Plaintiffs' confirmation to the Court that, given the current procedural posture of this action, the Court is obliged to release those funds to Defendants (ECF No. 998).

We provided Defendants' proposed order to Plaintiffs' counsel for review and comment more than 24 hours ago, stressing the urgency of prompt return of the funds given Defendants' financial needs (as set out in Defendants' appellate briefing in opposition to Plaintiffs' unsuccessful motion to stay the mandate; *see* ECF No. 997-3 at 16-19). Plaintiffs advised us that they do not perceive any urgency, and that they would have comments on Defendants' proposed order "today or tomorrow." *See* Tab B.<sup>1</sup> We informed Plaintiffs' counsel that we would submit Defendants' proposed order at 4:00 p.m. today, given that: Defendants urgently need the funds; Defendants' proposed order is quite short and thus does not require extensive time to review and

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<sup>1</sup> At Plaintiffs' request, we attach at Tab B counsel for the parties' written exchanges on the subject of the proposed order.

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comment; and, Plaintiffs have already confirmed that the Court is obliged to release the funds to Defendants (*see* ECF No. 998).

Notwithstanding the foregoing, Plaintiffs have not yet provided any substantive comments on Defendants' proposed order.

For the above reasons, Defendants respectfully request that the Court enter Defendants' proposed order at the Court's earliest convenience.

Respectfully submitted,

Squire Patton Boggs (US) LLP

/s/Gassan A. Baloul  
Gassan A. Baloul

cc: All ECF Counsel